

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

HTC Corporation, et al.,

Defendants

§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 6:13-cv-507-KNM

Consolidated Lead Case

DEFENDANTS' RESPONSE TO NOTICE OF COMPLIANCE

In compliance with the Court's Amended Docket Control Order (Dkt. No. 527), Defendants HTC Corporation, HTC America, Inc., Exedea, Inc., ZTE Corporation, ZTE (USA), Inc., ZTE Solutions, Inc., AT&T Mobility LLC, Cellco Partnership Inc. d/b/a Verizon Wireless, Sprint Solutions, Inc., Sprint Spectrum L.P. Boost Mobile, LLC, and T-Mobile USA, Inc., and T-Mobile US, Inc. file this Notice of their response to Plaintiff Cellular Communications Equipment LLC's letter brief to the Court requesting permission to file a *Daubert* motion to preclude Dr. Thomas Fuja from offering certain opinions regarding the invalidity of U.S. Patent No. 8,055,820. Defendants' response to Plaintiff's letter brief is attached as Exhibit 1.

Dated: June 20, 2016

Respectfully submitted,

By: /s/ Christopher W. Kennerly

Christopher W. Kennerly

TX Bar No. 00795077

chriskennerly@paulhastings.com

Jonas P. Herrell (*pro hac vice*)

CA Bar No. 279075

jonasherrell@paulhastings.com

Paul Hastings LLP

1117 S. California Ave.

Palo Alto, CA 94304-1106

Telephone: (650) 320-1800

Facsimile: (650) 320-1900

Jeffrey D. Comeau (*pro hac vice*)

CA Bar No. 259679

jeffreycomeau@paulhastings.com

Paul Hastings LLP

4747 Executive Drive

Twelfth Floor

San Diego, CA 92121-3114

Telephone: (858) 458-3000

Facsimile: (858) 458-3005

Trey Yarbrough

TX Bar No. 22133500

trey@yw-lawfirm.com

YARBROUGH WILCOX, PLLC

100 E. Ferguson St., Suite 1015

Tyler, Texas 75702

Telephone (903) 595-3111

Facsimile (903) 595-0191

ATTORNEYS FOR AT&T MOBILITY LLC

By: /s/Nicole S. Cunningham

Nicole S. Cunningham (CA State Bar No. 234390)

Email: Nicole.Cunningham@PillsburyLaw.com

Callie M. Bjurstrom (CA State Bar No. 137816)

Email: Callie.Bjurstrom@PillsburyLaw.com

Steve A. Moore (CA State Bar No. 232114)

Email: Steve.Moore@PillsburyLaw.com

PILLSBURY WINTHROP SHAW PITTMAN LLP

501 West Broadway, Suite 1100

San Diego, California 92101

Telephone: (619) 544-3119

Facsimile: (619) 236-1995

**ATTORNEYS FOR DEFENDANTS HTC
CORPORATION, HTC AMERICA, INC., ZTE
CORPORATION AND ZTE (USA) INC.**

By: /s/ Mark W. McGrory

Mark W. McGrory (pro hac vice)
Megan J. Redmond (pro hac vice)
Carrie A. Bader (pro hac vice)
ERISE IP, P.A.
6201 College Boulevard, Suite 300
Overland Park, KS 66211
Office: 913-777-5600
Fax: 913-777-5601
Email: mark.mcgrory@eriseip.com
Email: megan.redmond@eriseip.com
Email: _carrie.bader@eriseip.com

Robert W. Weber
Texas State Bar No. 21044800
SMITH WEBER, LLP
5505 Plaza Drive
PO Box 6167
Texarkana, TX 75505-6167
Office: 903-223-5656
Fax: 903-223-5652
Email: bweber@smithweber.com

**ATTORNEYS FOR DEFENDANTS SPRINT
SOLUTIONS, INC., SPRINT SPECTRUM
L.P., AND BOOST MOBILE, LLC**

By: /s/ Douglas J. Dixon

John C. Hueston (CA State Bar No. 164921)
jhueston@hueston.com
Alexander C. Giza (CA State Bar No. 212327)
agiza@hueston.com
Douglas J. Dixon (CA State Bar No. 275389)
ddixon@hueston.com
Zachary T. Elsea (CA State Bar No. 279252)
zelsea@hueston.com
HUESTON HENNIGAN LLP
523 W. Sixth Street, Suite 400
Los Angeles, CA 90014
Phone (213) 788-4340

Fax: (888) 775-0898

Melissa R. Smith (TX State Bar No. 24001351)
melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Ave.
Marshall, TX 75670
Phone (903) 934-8450
Fax (903) 934-9257

**ATTORNEYS FOR DEFENDANTS T-
MOBILE USA, INC. AND T-MOBILE US, INC.**

By: /s/ Michael E. Jones

Michael E. Jones
State Bar No. 10929400
Patrick C. Clutter, IV
State Bar No. 24036374
mikejones@potterminton.com
patrickclutter@potterminton.com
POTTER MINTON, P.C.
110 N. College Ave., Suite 500
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

Thomas M. Dunham
D.C. Bar No. 448407
tdunham@winston.com
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, D.C. 20006-3817
Telephone: (202) 282-5000
Facsimile: (202) 282-5100

Sarah J. Kalemeris
IL Bar No. 6303644
skalemeris@winston.com
WINSTON & STRAWN LLP
35 W Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

**ATTORNEYS FOR DEFENDANT
CELLCO PARTNERSHIP D/B/A/ VERIZON
WIRELESS**

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2016, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Christopher W. Kennerly
Christopher W. Kennerly